

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

SONYA DEMMINGS *
13950 King George Way *
Upper Marlboro, Maryland 20772 *

Plaintiff, *

v. * Case No. _____

CHIPOTLE MEXICAN GRILL, INC. *
1401 Wynkoop *
Suite 500 *
Denver, Colorado 80202 *

SERVE ON: *
CSC-Lawyers Incorporating *
Service Company *
7 St. Paul Street *
Suite 820 *
Baltimore, Maryland 21202 *

Defendants. *

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Sonya Demmings, by undersigned counsel, hereby
files this Complaint against Chipotle Mexican Grill, Inc.,
Defendant herein, and alleges as follows:

I. JURISDICTION AND VENUE

1. Plaintiff invokes the jurisdiction of this Court
pursuant 28 U.S.C. § 1332.

2. Venue is proper in this Court pursuant to 28 U.S.C. §
1391(a).

3. The amount in controversy herein exceeds the sum of \$75,000.00, exclusive of interest and costs.

II. PARTIES

4. Sonya Demmings ("Demmings") is a citizen of the State of Maryland with a residence in Prince George's County, Maryland at 13950 King George Way, Upper Marlboro, Maryland 20772.

5. Chipotle Mexican Grill, Inc. ("CMG") is a Colorado based Corporation with its principal place of business located at 1401 Wynkoop, Suite 500, Denver, Colorado 80202. Upon information and belief, Chipotle Mexican Grill, Inc. operates many restaurants throughout Maryland, one of which is located at 2989 Plaza Drive, Dunkirk, Maryland 20754.

III. FACTS

6. On or about March 21, 2021, Demmings was an invitee at the Chipotle Mexican Grill located at the property known as 2989 Plaza Drive, Dunkirk, Maryland 20754 ("Premises") for the purpose of eating in the outside seating area located on the Premises.

7. As Demmings proceeded through the outdoor seating area, her foot struck an unmarked umbrella stand causing her to fall to the ground and sustain profound and painful injuries to her elbow, arm, legs, and body. As a result of the injuries sustained, Demmings was forced to incur substantial medical

bills. As of the date of the filing of this Complaint, Demmings is still experiencing periodic pain and discomfort as result of the injuries she sustained as a result of her fall on March 21, 2021 and may be in need of future medical care.

8. At all times prior to her fall, Demmings maintained a proper and vigilant outlook as she proceeded through the outdoor seating area and her actions in no way contributed to her fall. To the contrary, Demmings' injuries were solely the result of the unreasonable acts and omissions of Defendant, CMG.

9. Prior to this accident, CMG knew or should have known that (1) the unmarked umbrella stand which caused Demmings to fall constituted a hazardous condition; and (2) no adequate warnings were posted to alert patrons, like Demmings, of the aforementioned dangerous condition located on the Premises. Notwithstanding said knowledge and notice, CMG failed to take reasonable actions to prevent and/or cure the hazardous conditions which it knew or should have known could result in injuries to its customers.

COUNT I
(Negligence)

10. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1-9.

11. CMG, at all times material to this Complaint, was in possession, custody and control of the property known as the

Chipotle Mexican Grill located at 2989 Plaza Drive, Dunkirk, Maryland 20754. As such, CMG owed a duty to Demmings, and all invitees who were lawfully on the premises, to properly maintain the walkways on the Premises free from the dangerous conditions, like unmarked umbrella stands, which could cause injury. CMG also had a duty to warn Demmings, and all other patrons lawfully entering onto the property, of any defects, dangers or other hazardous conditions which existed on the property.

12. On or about March 21, 2021, CMG breached the duties of care it owed to Demmings by failing to (1) divert her from the unmarked umbrella stand located in the outdoor seating area of the Premises; (2) properly maintain the walkways of the outdoor seating area in a manner safe for pedestrian traffic; and/or (3) warn Demmings, and other patrons lawfully on the Premises, of the aforementioned dangerous conditions of which it knew or should have known existed as of the time of Demmings's fall.

13. As a result of CMG's breaches of the duties of care owed to Demmings, Demmings sustained substantial damages.

WHEREFORE, Plaintiff, Sonya Demmings, prays that the Court enter judgment in her favor and against Defendant, Chipotle Mexican Grill, Inc., for compensatory damages in an amount exceeding \$75,000.00, with the exact amount to be determined at

trial, plus pre-judgment interest, costs, and such other and further relief as justice may require.

Respectfully submitted,



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Attorneys for Plaintiff,
Sonya Demmings

JURY TRIAL DEMANDED

Plaintiff hereby demands and request that all claims, actions and causes of action set forth herein be tried before a jury.



Matthew T. Holley